



Your business  
is our business.

REDACTED FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200  
Greenbelt, Maryland 20770  
phone: 301-459-7590, fax: 301-577-5575  
internet: www.jsitel.com, e-mail: jsi@jsitel.com

June 26, 2015

Accepted / Filed

JUN 26 2015

**Via Hand Delivery**

Federal Communications Commission  
Office of the Secretary

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: WC Docket No. 14-58  
2015 ETC Annual Report of McDonough Telephone Cooperative  
Study Area Code 341047**

Dear Ms. Dortch:

On behalf of McDonough Telephone Cooperative ("Company"), JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules.<sup>1</sup> Company seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.<sup>2</sup> The redacted version is also being filed this date via the FCC's Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of the initial section 54.202(a) of its Progress Report on its Five-Year Service Quality Improvement Plan and of outage reporting as required by Section 54.313(a)(1).<sup>3</sup>

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall  
JSI Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

No. of Copies rec'd 0 + 3  
List ABCDE

<sup>1</sup> 47 C.F.R. §§ 54.313, 54.422.

<sup>2</sup> *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Protective Order, DA 15-712 rel. June 17, 2015 (Protective Order). 47 C.F.R. § 54.313(f)(2).

<sup>3</sup> 47 C.F.R. §§ 0.457, 0.459, 54.313(a)(1).

Echelon Building II, Suite 200  
9430 Research Blvd., Austin, TX 78759  
phone: 512-338-0473, fax: 512-346-0822

Eagandale Corporate Center, Suite 310  
1380 Corporate Center Curve, Eagan, MN 55121  
phone: 651-452-2660, fax: 651-452-1909

6849 Peachtree Dunwoody Road  
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phone: 770-569-2105, fax: 770-410-1608

547 South Oakview Lane  
Bountiful, UT 84010  
phone: 801-294-4576, fax: 801-294-5124



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Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Federal Communications Commission  
Office of the Secretary

**Re: WC Docket No. 14-58  
2015 ETC Annual Report of McDonough Telephone Cooperative  
Study Area Code 341047  
Request for Confidentiality**

Dear Ms. Dortch:

John Staurulakis, Inc. ("JSI"), on behalf of its client McDonough Telephone Cooperative (the "Company") hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission's rules,<sup>1</sup> withholding from public inspection certain information contained in attachments to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).<sup>2</sup>

1. The information for which the Company is seeking confidential treatment are attachments to the Company's annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission's rules ("Report").<sup>3</sup>
2. Rate-of-Return Eligible Telecommunications Carriers ("ETCs") must file with the Commission an initial section 54.202(a) Five-Year Service Quality Improvement Plan ("Five-Year Plan")<sup>4</sup> and must also report outages, both of which are contained in attachments to the 2015 Report.
3. The information contained in attachments for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment. The Company also seeks withholding from public inspection data pertaining to the Company's outages provided at FCC Form 481 Line 200 attachment, Service

<sup>1</sup> 47 C.F.R. §§ 0.457, 0.459.

<sup>2</sup> 47 C.F.R. § 0.459(b)(1) through (9).

<sup>3</sup> 47 C.F.R. §§ 54.313, 54.422.

<sup>4</sup> See *In the Matter of Connect America Fund*, WC Docket No. 10-90, Order DA 14-591 (rel. May 1, 2014).



Outage Reporting. Information of this nature is confidential commercial information routinely withheld from public inspection.

4. With respect to identifying the degree to which the Five-Year Plan concerns a service that is subject to competition, the Line 112 attachment contains information of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment includes competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

In its *March 5, 2013 Order*, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories."<sup>5</sup> Accordingly, because the Company is a rate-of-return carrier, it must file a five-year service improvement plan which contains proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

With respect to identifying the degree to which the outage data contained in the Line 200 attachment concerns a service that is subject to competition, the information pertains to the network and operations of a telecommunications company that has competitors that could benefit if they were able to have access to this information.

5. With respect to identifying possible exposure to competitive harm, the information contained in the subject attachments is information that is not customarily released to the public. The Five-Year Plan information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.

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<sup>5</sup> See *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Order, DA 13-332 (rel. Mar. 5, 2013) ("*March 5, 2013 Order*") at para 9 citing Section 54.202(a) (1) (ii).

6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachments, the Company is filing the Five-Year Plan and outage attachments under seal. The Company uses the information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.
7. Any previous versions of this information are not publicly available.
8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
9. The Commission has previously concluded that there is a presumptive likelihood of substantial competitive harm from disclosure of outage information.<sup>6</sup> The Commission also determined the disclosure of outage reporting information to the public could present an unacceptable risk of more effective terrorist activity and could therefore result in potential harm to the public and the national defense.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment, and to the Company's outage data provided at FCC Form 481 Line 200 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,



John Kuykendall  
JSI Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

---

<sup>6</sup> See *In the Matter of New Part 4 of the Commission's Rules Concerning Disruptions to Communications*, ET Docket No. 04-35, *Report and Order and Further Notice of Proposed Rulemaking*, FCC 04-188, rel. Aug. 19, 2004, para. 45.



<010> Study Area Code	341047	<b>Accepted / Filed</b>
<015> Study Area Name	MCDONOUGH TEL COOP	
<020> Program Year	2016	<b>JUN 26 2015</b>
<030> Contact Name: Person USAC should contact with questions about this data	Jay P. Griswold	
<035> Contact Telephone Number: Number of the person identified in data line <030>	3097763211 ext.	<b>Federal Communications Commission Office of the Secretary</b>
<039> Contact Email Address: Email of the person identified in data line <030>	jay@mdtc.net	

<100> Service Quality Improvement Reporting	(complete attached worksheet)	(check box when complete)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<200> Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210> <input type="checkbox"/> <-- check box if no outages to report		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<300> Unfulfilled Service Requests (voice)	0	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<310> Detail on Attempts (voice)	(attach descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<320> Unfulfilled Service Requests (broadband)	0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<330> Detail on Attempts (broadband)	(attach descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<410> Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420> Mobile	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<440> Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<450> Mobile	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> 34104711510.pdf	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610> 34104711610.pdf	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)?	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1000> Voice Services Rate Comparability Certification	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1010>	(attach descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1100> Certify whether terrestrial backhaul options exist (Yes or No)	(if not, check to indicate certification)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1110>	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

**Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet**

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<2005>	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet</b>			
<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

**(100) Service Quality Improvement Reporting  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<b>&lt;010&gt;</b>	Study Area Code	341047
<b>&lt;015&gt;</b>	Study Area Name	MCDONOUGH TEL COOP
<b>&lt;020&gt;</b>	Program Year	2016
<b>&lt;030&gt;</b>	Contact Name - Person USAC should contact regarding this data	Jay P. Griswold
<b>&lt;035&gt;</b>	Contact Telephone Number - Number of person identified in data line <030>	3097763211 ext.
<b>&lt;039&gt;</b>	Contact Email Address - Email Address of person identified in data line <030>	jay@mdtc.net

**<110>** Has your company received its ETC certification from the FCC? (yes / no) ☐ ☒

If your answer to Line <110> is yes, do you have an existing §54.202(a) "5

**<111>** year plan" filed with the FCC? (yes / no) ☐ ☐

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

**<112>** Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

34104711112.pdf

Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

**<113>** Maps detailing progress towards meeting plan targets

**<114>** Report how much universal service (USF) support was received

**<115>** How much (USF) was used to improve service quality and how support was used to improve service quality

**<116>** How much (USF) was used to improve service coverage and how support was used to improve service coverage

**<117>** How much (USF) was used to improve service capacity and how support was used to improve service capacity

**<118>** Provide an explanation of network improvement targets not met in the prior calendar year.

Yes
Yes
Yes
Yes
Yes
Not Applicable

FCC Form 481  
OMB Control No. 3060-0985/OMB Control No. 3060-0819  
July 2013

[illegible]



ENVIRONMENTAL CONTROL No. 3060-0819

<701>	Residential Local Service Charge Effective Date	1/1/2015
<702>	Single State-wide Residential Local Service Charge	

[illegible]



**(7/10) Broadband Price Offerings**  
**Data Collection Form.**

See also: [What's New in the World of Business](#)

<010>	Study Area Code	341047
<015>	Study Area Name	MCDONOUGH TEL COOP
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Jay P. Griswold
<035>	Contact Telephone Number - Number of person identified in data line <030>	3097763211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jaymdtc.net

[illegible]

### Data Collection Form

900-5586 / CM-43 Control No. 3050-0619

<010>	Study Area Code	341047
<015>	Study Area Name	MCDONOUGH TEL COOP
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Jay P. Griswold
<035>	Contact Telephone Number - Number of person identified in data line <030>	3097763211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jay@mdtc.net
<810>	Reporting Carrier	McDonough Telephone Cooperative
<811>	Holding Company	Not Applicable
<812>	Operating Company	McDonough Telephone Cooperative

[illegible]

(900) Tribal Lands Reporting  
Data Collection Form

Form No. 3000-0007 Rev. 02/04/06

<010>	Study Area Code	34107
<015>	Study Area Name	MCDONOUGH TEL COOP
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Jay P. Griawold
<035>	Contact Telephone Number - Number of person identified in data line <030>	3097763211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jaymdtc.net

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable





**(1200) Terms and Condition for Lifeline Customers**  
**Lifeline**  
**Data Collection Form**

<010> Study Area Code	341047
<015> Study Area Name	MCDONOUGH TEL COOP
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Jay P. Griewold
<035> Contact Telephone Number - Number of person identified in data line <030>	3097763211 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	jay@mdtc.net

341047111210.pdf

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒
- <1222> Details on the number of minutes provided as part of the plan, ☒
- <1223> Additional charges for toll calls, and rates for each such plan. ☒

(2000) Price Cap Carrier Additional Documentation

Data Collection Form

Including Note-of-Return Carriers submitted with Price Cap Letter

Form Number: 3050-0819

<010>	Study Area Code	341047
<015>	Study Area Name	MCDOWOUGH TEL COOP
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	JAY P. GRISWOLD
<035>	Contact Telephone Number - Number of person identified in data line <030>	3097763211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jayamcd@net

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

- <2010> 2nd Year Certification (47 CFR § 54.313(b)(1)i)
- <2011a> 3rd Year Certification (47 CFR § 54.313(b)(1)ii)
- <2011b> Attachment (47 CFR § 54.313(b)(1)ii)

Name of Attached Document(s) Listing Required Information

Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a))

- <2012> 2013 Frozen Support Calculation (47 CFR § 54.313(c)(1))
- <2013> 2014 Frozen Support Calculation (47 CFR § 54.313(c)(2))
- <2014> 2015 Frozen Support Calculation (47 CFR § 54.313(c)(3))
- <2015> 2016 and future Frozen Support Calculation (47 CFR § 54.313(c)(4))

Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d))

- <2016> Certification Support Used to Build Broadband

Connect America Phase II Reporting (47 CFR § 54.313(e))

- <2017> 3rd year Broadband Service Certification
- <2018> 5th year Broadband Service Certification
- <2019> Interim Progress Certification
- <2020> Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

- <2021> Interim Progress Community Anchor Institutions

Name of Attached Document(s) Listing Required Information



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Study Area Code  
Study Area Name  
Program Year  
Contact Name - Person USAC should contact regarding this data  
Contact Telephone Number - Number of person identified in data line 4030  
Contact Email Address - Email Address of person identified in data line 4030

4110 Study Area Code 341047  
4115 Study Area Name MCDONOUGH TEL COOP  
4200 Program Year 2016  
4205 Contact Name - Person USAC should contact regarding this data JAY P. GRABOWSKI  
4300 Contact Telephone Number - Number of person identified in data line 4030 302752311 ext.  
4305 Contact Email Address - Email Address of person identified in data line 4030 jay@tdc.net

CHECK the boxes below to note compliance on the five year service quality plan (pursuant to 47 CFR § 54.313(f)(2)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010) Progress Report on 5 Year Plan  
Milestone Certification (47 CFR § 54.313(f)(1)(i))

Name of Attached Document Listing Required Information

Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(i). The carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

(3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))

Name of Attached Document Listing Required Information

(3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))  
(3014) If yes, does your company file the RUS annual report

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)

(3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

(3018) If the response is no on line 3014, is your company audited?

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3025 pursuant to § 54.313(f)(2), contains:

(3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications

(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3021) Management letter and audit opinion issued by the independent certified public accountant that performed the company's financial audit

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3025 pursuant to § 54.313(f)(2), contains:

(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,

(3023) Underlying information subjected to a review by an independent certified public accountant

(3024) Underlying information subjected to an officer certification.

(3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

<B10>	Study Area Code	341047
<B15>	Study Area Name	MCDONOUGH TEL COOP
<B20>	Program Year	2016
<B30>	Contact Name - Person USAIC should contact regarding this data	JAY P. GRIEWOOLD
<B35>	Contact Telephone Number - Number of person identified in data line <B30>	3027763211 ext.
<B39>	Contact Email Address - Email Address of person identified in data line <B30>	jay@gmtc.net

(3027) Revenue

(3028) Operating Expenses

**(3029) Net Income**

**(3030) Telephone Plant In Service(TPIS)**

**(3031) Total Assets**

**(3032) Total Debt**

**(3033) Total Equity**

### (3034) Dividends

Name of Attached Document Listing Required Information

<b>Certification - Reporting Carrier:</b>	<b>Form 47</b>
<b>Data Collection Form</b>	<b>OMB Control No. 3045-0047</b>

<010> Study Area Code	341047
<015> Study Area Name	MCDONOUGH TEL COOP
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Jay P. Griewold
<035> Contact Telephone Number - Number of person identified in data line <030>	3097763211 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	jay@mdtc.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

<b>Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients</b>	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	





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## Attachments

**(200) Service Outage Reporting (Voice)**  
**Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	341047
<015>	Study Area Name	MCDONOUGH TEL COOP
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Jay P. Griswold
<035>	Contact Telephone Number - Number of person identified in data line <030>	3097763211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jayandtc.net

[illegible]



REDACTED FOR PUBLIC INSPECTION

(700) Price Offerings including Voice Rate Data  
Data Collection Form

Form 700-1 (Rev. 10/01) Control No. 3050-0819

<010> Study Area Code 341047  
 <015> Study Area Name MCDONOUGH TEL COOP  
 <020> Program Year 2016  
 <030> Contact Name - Person USAC should contact regarding this data Jay P. Griawold  
 <035> Contact Telephone Number - Number of person identified in data line <030> 3097763211 ext.  
 <039> Contact Email Address - Email Address of person identified in data line <030> jay@mdtc.net

<701> Residential Local Service Charge Effective Date 1/1/2015  
 <702> Single State-wide Residential Local Service Charge

<703>

State	Exchange (ILEC)	SAC (CETC)	Rate Type	Residential Local Service Rate	State Subscriber Line Charge	State Universal Service Fee	Mandatory Extended Area Service Charge	Total per line Rates and Fees
IL	Adair		FR	22.23	0.0	0.23	0.0	22.46
IL	Bardolph		FR	22.23	0.0	0.23	0.0	22.46
IL	Blandinsville		FR	22.23	0.0	0.23	0.0	22.46
IL	Colchester		FR	22.23	0.0	0.23	0.0	22.46
IL	Colusa		FR	22.23	0.0	0.23	0.0	22.46
IL	Good Hope		FR	22.23	0.0	0.23	0.0	22.46
IL	Industry		FR	22.23	0.0	0.23	0.0	22.46
IL	Littleton		FR	22.23	0.0	0.23	0.0	22.46
IL	Lomax		FR	22.23	0.0	0.23	0.0	22.46
IL	Raritan		FR	22.23	0.0	0.23	0.0	22.46
IL	Smithshire		FR	22.23	0.0	0.23	0.0	22.46
IL	Swan Creek		FR	22.23	0.0	0.23	0.0	22.46
IL	Adair		MT	16.0	0.0	0.16	0.0	16.16
IL	Bardolph		MT	16.0	0.0	0.16	0.0	16.16
IL	Blandinsville		MT	16.0	0.0	0.16	0.0	16.16
IL	Colchester		MT	16.0	0.0	0.16	0.0	16.16
IL	Colusa		MT	16.0	0.0	0.16	0.0	16.16
IL	Good Hope		MT	16.0	0.0	0.16	0.0	16.16
IL	Industry		MT	16.0	0.0	0.16	0.0	16.16
IL	Littleton		MT	16.0	0.0	0.16	0.0	16.16
IL	Lomax		MT	16.0	0.0	0.16	0.0	16.16

REDACTED FOR PUBLIC INSPECTION

(700) Price Offerings including Value-At-Risk Data  
Data Collection Form

1995-1996 OMB Circular No. 390-3919

<010>	Study Area Code	341047
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015	Study Area Name	MCDONOUGH TEL COOP
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<020>	Program Year	2016
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<030> Contact Name - Person USAC should contact regarding this data Jay P. Griswold

<035>	Contact Telephone Number - Number of person identified in data line <030>	3097763211 ext.
-------	---	-----------------

<039> Contact Email Address - Email Address of person identified in data line <030> jayemdtdc.net

1/1/2015

<702> Single State-wide Residential Local Service Charge

<703>

[illegible]

REDACTED FOR PUBLIC INSPECTION

(710) Broadband Price Offerings  
Data Collection Form

CLASSIFICATION: UNCLASSIFIED CONTROLLING: 2050-0019

<010> Study Area Code 341047

<015>	Study Area Name	MCDONOUGH TEL COOP
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<020>	Program Year	2016
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<030>	Contact Name - Person USAC should contact regarding this data	Jay P. Griswold
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<035>	Contact Telephone Number - Number of person identified in data line <030>	3097763211 ext.
-------	---	-----------------

<039>	Contact Email Address - Email Address of person identified in data line <030>	jayamdte.net
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<711>

[illegible]



**McDonough Telephone Cooperative's demonstration of complying with applicable service quality standards and consumer protection rules for voice and broadband services:**

In establishing this certification in its *2005 ETC Order*,<sup>1</sup> the FCC found that an ETC must make "a specific commitment to objective measures to protect consumers."<sup>2</sup> The Commission found that for wireless ETCs, compliance with CTIA's Consumer Code for Wireless Service would satisfy this requirement" and that the sufficiency of other commitments would be considered on a case-by-case basis.<sup>3</sup> In this context, the FCC stated, "to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement."<sup>4</sup>

McDonough Telephone Cooperative ("Company") hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company is subject to consumer protection obligations under the Illinois Administrative Code (IAC), Title 83: Public Utilities, Chapter I: Illinois Commerce Commission, Subchapter f: Telephone Utilities. These obligations include, but are not limited to, the following: adherence to Illinois state consumer protection requirements governing telephone providers which include Quality of Service rules as identified in IAC Part 730

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<sup>1</sup> *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) ("*2005 ETC Order*").

<sup>2</sup> *Id.* at para. 28.

<sup>3</sup> *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: "(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy." *Id.* at n. 71.

<sup>4</sup> *Id.* at n. 72.

and 732, and Compliance with Anti-Slamming and Anti-Cramming Procedures as adopted in Illinois Public Act 90-610 and 97-0822, (3) truth-in-billing requirements pursuant to federal rule and IAC 735.70; and (4) CPNI, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

The Company is subject to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3. The Company furthermore will comply with all requirements set forth in the *2015 Open Internet Order* when it becomes effective.

**McDonough Telephone Cooperative's demonstration of ability to function in emergency situations for voice and broadband services:**

McDonough Telephone Cooperative ("Company") hereby certifies that it is able to function in emergency situations as set forth in the Code of Federal Regulations, Title 47, Part 54, Subpart C, §54.202(a)(2)<sup>1</sup> and Title 83, Chapter I, Sub-Chapter f, Section 730.325 of the Illinois Administrative Code. The Company's network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. In accordance, and compliance, with Title 83, Chapter I, Sub-Chapter f, Section 730.325 (b), all switching offices or equivalent with installed emergency power generating equipment have a minimum of three (3) hours battery capacity; switching offices or

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<sup>1</sup> Section 54.202(a)(2) requires ETCs that are designated by the Commission to "demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."



equivalent without installed emergency power generating equipment have a minimum battery capacity of five (5) hours.

The company's standby generators and battery back-up support both voice and broadband network equipment should an emergency situation occur.

**REDACTED – FOR PUBLIC INSPECTION**

**ATTACHMENT - LINE 112**

**Five-Year Network Improvement Plan and  
Progress Report**

**ATTACHMENT REDACTED IN ENTIRETY**

## **Lifeline Assistance**

### **General**

Lifeline Assistance reduces an eligible customer's monthly Federal Subscriber Line Charge and rates for local service. An eligible customer receives credit for the Federal Subscriber Line Charge as well as a credit towards the residential local exchange access line rate.

### **Regulations**

1. Lifeline Assistance is available to all residential customers who meet the following eligibility requirements:
  - a. Customers, their dependent, or their household must be participants in one of the following programs: Medicaid; SNAP; Supplementary Security Income (SSI); federal public housing assistance or Section 8 (a Federal Housing Assistance Program administered by the department of Urban Development); Low Income Home Energy Assistance Program (LIHEAP); Temporary Assistance for Needy Families (TANF) or National School Lunch free lunch program.
  - b. In addition, a consumer may be eligible if his or her household income is at or below 135% of the Federal Poverty Guidelines.
2. As a participant in Lifeline Assistance, customers are eligible to receive Toll Blocking Service. These services will only be provided at the customer's request. The FUSC (Federal Universal Service Charge) will not apply to customers participating in this program.
3. The Lifeline discount is effective upon receipt of a completed certification form and proof of eligibility.
4. Only one Lifeline discount is available per household. Lifeline is not transferable.
5. Lifeline customers must recertify their continued eligibility annually. Customers must certify that they continue to be eligible for Lifeline and that no one in their household is receiving the Lifeline discount from another company.



Failure to demonstrate continued eligibility will result in the loss the Lifeline discount.

### **Lifeline Credit**

Eligible Subscribers will receive a credit on monthly local exchange access service of \$9.25.

REDACTED FOR PUBLIC INSPECTION



## 2015 CAF ICC Data Collection

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Logged in User: Jon Bolke

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Study Area: MCDONOUGH TEL COOP (ID: 341047)

## Study Area - Exchange Level Residential Lines and Local Rates for ARC Calculation

[Upload Residential Lines & Rates](#)[Download NECA template](#)
[Exchange Level Residential Lines & Rates](#) [Residential Lines & Rates Summary](#) [Study Area Test Period Lines](#)

## Residential Lines and Local Rates Data

Average Number of Lines for Test Period (2015-2016)

Company needs to update the local rates if the rates as of January 1, 2015 are HIGHER than the pre-populated rates (as of January 1, 2012). Please ensure the sum of Residential lines excluding Life lines of all exchanges must match the forecasted Residential lines excluding Life lines at the study area level.

Exchange/Zone Name	Residential Access Lines	Life Lines	Current Residential Flat Rate	Additional Basic Local Rate Charges	Mandatory Expanded Calling	Fed Subscriber Line Charge	State Subscriber Line Charge	State USF Surcharge	County E-911 Surcharge	State E-911 (e.g. fire & police)	TRS & other hearing impaired Surcharges	Total Local Rates as of January 1, 2015	Total Local Rates as of January 1, 2012	Delete Exchange?
	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		
Adair/Fulton	3	0	22.23	0.00	0.00	6.50	0.00	0.23	1.85	0.00	0.08	30.89	27.52	
Adair/McDonoug	94	0	22.23	0.00	0.00	6.50	0.00	0.23	1.40	0.00	0.08	30.44	27.52	
Adair/McDonoug	35	0	16.00	0.00	0.00	6.50	0.00	0.16	1.40	0.00	0.08	24.14	27.52	
Bardolph/McDon	78	1	22.23	0.00	0.00	6.50	0.00	0.23	1.40	0.00	0.08	30.44	24.51	
Bardolph/McDon	66	0	16.00	0.00	0.00	6.50	0.00	0.16	1.40	0.00	0.08	24.14	24.51	
Blandinsville/Hai	11	0	22.23	0.00	0.00	6.50	0.00	0.23	1.95	0.00	0.08	30.99	27.93	
Blandinsville/Hai	10	0	16.00	0.00	0.00	6.50	0.00	0.16	1.95	0.00	0.08	24.69	27.93	
Blandinsville/Hei	5	0	22.23	0.00	0.00	6.50	0.00	0.23	0.00	0.00	0.08	29.04	27.93	
Blandinsville/Hei	2	0	16.00	0.00	0.00	6.50	0.00	0.16	0.00	0.00	0.08	22.74	27.93	
Blandinsville/Mc	226	3	22.23	0.00	0.00	6.50	0.00	0.23	1.40	0.00	0.08	30.44	27.93	
Blandinsville/Mc	53	0	16.00	0.00	0.00	6.50	0.00	0.16	1.40	0.00	0.08	24.14	27.93	
Colchester/Hanc	12	0	22.23	0.00	0.00	6.50	0.00	0.23	1.95	0.00	0.08	30.99	26.63	
Colchester/Hanc	16	0	16.00	0.00	0.00	6.50	0.00	0.16	1.95	0.00	0.08	24.69	26.63	
Colchester/McDr	507	10	22.23	0.00	0.00	6.50	0.00	0.23	1.40	0.00	0.08	30.44	26.63	
Colchester/McDr	217	0	16.00	0.00	0.00	6.50	0.00	0.16	1.40	0.00	0.08	24.14	26.63	
Colusa/Hancock	98	2	22.23	0.00	0.00	6.50	0.00	0.23	1.95	0.00	0.08	30.99	27.36	
Colusa/Hancock	23	0	16.00	0.00	0.00	6.50	0.00	0.16	1.95	0.00	0.08	24.69	27.36	
Good Hope/Hanc	0	0	22.23	0.00	0.00	6.50	0.00	0.20	1.95	0.00	0.08	30.96	26.66	
Good Hope/Hanc	1	0	22.23	0.00	0.00	6.50	0.00	0.23	0.00	0.00	0.08	29.04	26.66	
Good Hope/McD	177	1	22.23	0.00	0.00	6.50	0.00	0.23	1.40	0.00	0.08	30.44	26.66	
Good Hope/McD	82	0	16.00	0.00	0.00	6.50	0.00	0.16	1.40	0.00	0.08	24.14	26.66	



Good Hope/Warri	0	0	16.00	0.00	REDACTED FOR PUBLIC INSPECTION	0.16	1.35	0.00	0.08	24.09	26.66	☒
Industry/McDon	175	0	22.23	0.00	0.00	0.00	1.40	0.00	0.08	30.44	25.77	☒
Industry/McDon	86	0	16.00	0.00	0.00	0.00	1.40	0.00	0.08	24.14	25.77	☒
Industry/Schuyt	3	0	22.23	0.00	0.00	0.00	0.00	0.00	0.08	29.04	25.77	☒
Industry/Schuyt	4	0	16.00	0.00	0.00	0.00	0.00	0.00	0.08	22.74	25.77	☒
Littleton/McDonc	5	0	22.23	0.00	0.00	0.00	1.40	0.00	0.08	30.44	27.65	☒
Littleton/McDonc	2	0	16.00	0.00	0.00	0.00	1.40	0.00	0.08	24.14	27.65	☒
Littleton/Schuyt	92	1	22.23	0.00	0.00	0.00	0.00	0.00	0.08	29.04	27.65	☒
Littleton/Schuyt	34	0	16.00	0.00	0.00	0.00	0.00	0.00	0.08	22.74	27.65	☒
Lomax/Hendersc	127	10	22.23	0.00	0.00	0.00	0.00	0.00	0.08	29.04	28.69	☒
Lomax/Hendersc	19	0	16.00	0.00	0.00	0.00	0.00	0.00	0.08	22.74	28.69	☒
Paritan/Henders	60	0	22.23	0.00	0.00	0.00	0.00	0.00	0.08	29.04	27.88	☒
Paritan/Henders	4	0	16.00	0.00	0.00	0.00	0.00	0.00	0.08	22.74	27.88	☒
Paritan/McDonoi	1	0	22.23	0.00	0.00	0.00	1.40	0.00	0.08	30.44	27.88	☒
Paritan/Warren	2	0	22.23	0.00	0.00	0.00	1.35	0.00	0.08	30.39	27.88	☒
Paritan/Warren	4	0	16.00	0.00	0.00	0.00	1.35	0.00	0.08	24.09	27.88	☒
Smithshire/Henc	7	0	22.23	0.00	0.00	0.00	0.00	0.00	0.08	29.04	28.59	☒
Smithshire/Henc	1	0	16.00	0.00	0.00	0.00	0.00	0.00	0.08	22.74	28.59	☒
Smithshire/Wari	35	0	22.23	0.00	0.00	0.00	1.35	0.00	0.08	30.39	28.59	☒
Smithshire/Wari	11	0	16.00	0.00	0.00	0.00	1.35	0.00	0.08	24.09	28.59	☒
Swan Creek/McT	4	0	22.23	0.00	0.00	0.00	1.40	0.00	0.08	30.44	26.19	☒
Swan Creek/McT	1	0	16.00	0.00	0.00	0.00	1.40	0.00	0.08	24.14	26.19	☒
Swan Creek/Wai	51	0	22.23	0.00	0.00	0.00	1.35	0.00	0.08	30.39	26.19	☒
Swan Creek/Wai	23	0	16.00	0.00	0.00	0.00	1.35	0.00	0.08	24.09	26.19	☒

Data previously submitted on 3/24/2015 4:48:47 PM (Eastern Time)

Data submitted by Patricia Hoyt

Submit Response

[Records response entered/updated on the above part of the screen]



**McDonough Telephone Cooperative (SAC 341047)**

**Response to Line 3010 – Milestone Certification (47 CFR §54.313(f)(1)(i))**

McDonough Telephone Cooperative hereby certifies that throughout 2014, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream, and currently, it is taking reasonable steps to provide upon reasonable request actual speeds of at least 10 Mbps downstream/1 Mbps upstream broadband service at with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas as determined in an annual survey, and that requests for such service are met within a reasonable amount of time.

**McDonough Telephone Cooperative (SAC 341047)**

**Response to Line 3012 - List of Community Anchor Institutions to Which the ETC Newly  
Began Providing Service**

The FCC's *USF/ICC Transformation Order* requires a listing of community anchor institutions to which the ETC newly began providing broadband service. McDonough Telephone Cooperative did not newly begin providing community anchor institutions with access to broadband service in calendar year 2014.

**REDACTED – FOR PUBLIC INSPECTION**

**ATTACHMENT - LINE 3026**

**ATTACHMENT REDACTED IN ENTIRETY**